

BRACEWELL

April 25, 2019

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Mustafa Abdel-Wadood 19 Cr. 00233 (LAK)

Dear Judge Kaplan:

At our conference on Tuesday, we discussed our intention to present the Court with a proposed bail package to secure Mr. Abdel-Wadood's release from the MCC. Our hope was to submit a proposal to the Court this afternoon. Discussions with the government are ongoing and should be concluded later today or in the morning. By the lunch hour tomorrow, we should have a letter to the Court detailing the proposed package and indicating whether it is, or is not, on consent. We apologize for the delay.

Respectfully submitted,

/s/Paul Shechtman

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